

Exhibit 2

"Nathan Finch"
<NDF@Capdale.com>

02/07/2006 04:49 PM

To "Amanda Basta" <ABasta@kirkland.com>,
<dlfelder@swidlaw.com>, "Jeffrey Liesemer"
<JAL@Capdale.com>, <rhwyron@swidlaw.com>, "Peter
Lockwood" <PVNL@Capdale.com>
cc "Barbara Harding" <bharding@kirkland.com>, "Elli
Leibenstein" <eleibenstein@kirkland.com>, "Jeffrey
Liesemer" <JAL@Capdale.com>
Subject RE: W.R. Grace-- Rust Protocols
t

Rick Wyron and Debra Felder are no longer at Swidler; please resend this email to them at their new address at orrick.

With respect to the protocols for reviewing the questionnaires; our experts are still reviewing them but have already identified a host of flaws with the approach. Rust is the Debtor's claims agent; not an agent of the Court, and this is your discovery, not ours. We have no obligation to improve your discovery efforts and our experts will identify the flaws in Rust's approach and any reliance your experts place upon the database Rust constructs at the appropriate time in the process, which in our view is in connection with expert reports from our estimation experts, which are due in June and late August. This was the approach approved by Judge Conti in the USG case and I doubt Judge Fitzgerald will view the matter differently.

With respect to the web site from which parties will be able to access the individual questionnaires themselves; until the questionnaires are received and we ask for access to them we will not know whether your suggested approach will work. In our view we (the ACC and FCR) are entitled to "real time" unlimited access to the questionnaires, and if this means requiring Grace to copy them all and ship them to us we will ask the Court for an order to that effect. It may well be that your web site based approach will work, but until it is operational we will not be able to access it to determine that.

NDF

-----Original Message-----

From: Amanda Basta [mailto:ABasta@kirkland.com]
Sent: Tue 2/7/2006 4:22 PM
To: dlfelder@swidlaw.com; Jeffrey Liesemer; Nathan Finch;
rhwyron@swidlaw.com
Cc: Barbara Harding; Elli Leibenstein
Subject: Re: W.R. Grace-- Rust Protocols

All--

We have not yet received any comments on the navigable database protocols. Per our previous correspondence, if you have any

comments, please forward them to us by close of business today. Rust plans to begin construction of the database and website this week. Please let us know if you have any questions.

Thank you,

Amanda

Amanda Basta/Washington DC/Kirkland-Ellis

01/31/2006 04:08 PM

To
ndf@capdale.com, jal@capdale.com, rhwyron@swidlaw.com, dlfelder@swidlaw.com
cc
Barbara Harding/Washington DC/Kirkland-Ellis, Elli
Leibenstein/Chicago/Kirkland-Ellis@K&E
Subject
W.R. Grace-- Rust Protocols

All--

Attached please find the proposed data export structure that Rust Consulting intends to use in compiling the W.R. Grace Asbestos Personal Injury Questionnaires into a navigable database per Paragraph 3.D of the Case Management Order for the Estimation of Asbestos Personal Injury Liabilities ("PI CMO"). Please contact us by Tuesday, February 7, 2006 if you have any questions or comments on the protocols.

Also attached is a description of the website that Rust will construct to enable all parties and their experts access to the Questionnaires and supporting materials per paragraph 3.D and footnote 3 of the CMO. If you have any questions regarding the website or its construction, please let us know.

Regards,

Amanda

Amanda Basta
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